



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

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JUN 16 2014

NMED
Hazardous Waste Bureau

DeAnna Rothaupt
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550 Tabosa Avenue
Holloman AFB NM 88330-8458

New Mexico Environment Department
Attn: Mr. John Kieling, Chief
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe NM

JUN 10 2014

Dear Mr. Kieling:

We received your letter dated February 20, 2014 directing the Air Force to submit SWMU Assessment Reports (SARs) for the two former skeet ranges (TS851, TS859) and the Jeep Target Area Skeet Range (TS862) under the Holloman AFB RCRA Hazardous Waste Facility Permit.

Holloman AFB is aware that NMED wants the Air Force to appropriately address the potential risks posed by these sites and consulted with AFLOA's Environmental Field Support Center and the 49th Wing Judge Advocate's office to determine a way forward.

They respectfully submit the following additional information for your consideration concerning your assessment that these are not military ranges.

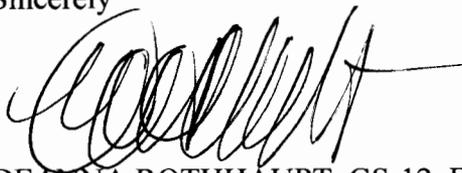
Your letter states, "The NMED does not believe that these skeet ranges, which are primarily used for recreational purposes, can be considered to be military ranges and notes that surface soils at the sites are contaminated with RCRA hazardous constituents. Therefore, SARs must be submitted for these three sites." However, skeet ranges of the eras represented by these sites were as a matter of fact utilized in military training of gunners for training in aiming at moving targets, and in the case of the Jeep Target Range Area Skeet Range, from a moving platform as well. The report of investigation of these sites reflects materials not ordinarily associated with recreational skeet activities. With respect to TS851, in addition to small arms debris, pistol bullets of 9mm, .38, and .45 calibers were also documented, items not typically associated with skeet range activities. With respect to TS859, a survey documented shotgun shell cases, burned clay pigeons, .45-caliber automatic pistol cartridges (era 1941 to 1942), and hundreds of spent cartridges located in three of four trash piles. Additionally, 1940s historic aerial photos show a four firing point skeet range at this location. Dark areas in contrast to the natural terrain, indicative of clay pigeon debris, are also visible on aerial photography from 1945. While shotgun

shells and clay target debris are typical items observed at a skeet range such as TS859, other items unrelated to typical skeet range activities such as a .50 cal casing and projectile, 5.56mm blanks, and two intact 7.62mm rounds were also found. Concerning TS862, shotgun shells were reported among a 20-ft. diameter concentration of .45-caliber cartridge casings and other miscellaneous carbine casings located approximately 1,800 ft. west of the firing positions.

Accordingly, we believe these ranges are best described as military ranges and request NMED allow the Air Force to continue clean-up of these three ranges in accordance with The Air Force Guide for Conducting the Comprehensive Site Evaluation Phase I at Air Force Munitions Response Areas, (Version 3.0, July 2005) and its MMRP authority, pursuant to DERP §10 USC 2710. Again, Holloman AFB will ensure that NMED is afforded notice, review, and comment opportunities as to all distinct phases regarding these site cleanups.

If you have any additional questions, or if you would like to discuss this issue further, please contact me at (575) 572-3931 or by e-mail at deanna.rothhaupt@holloman.af.mil.

Sincerely



DEANNA ROTHHAUPT, GS-12, DAFC

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